United States Environmental Protection Agency
Office of Public Affairs
Region 5
77 West Jackson Boulevard (P-19J)
Chicago, Illinois 60604
Illinois Indiana
Michigan Minnesota
Ohio Wisconsin

U.S. EPA Signs Amended Record of Decision for the Industrial Excess Landfill Superfund Site

Uniontown, Ohio **March 2000**

This fact sheet contains information about:

- IEL site background and history
- The amended ROD
- Public comments on the amended ROD
- Future public involvement opportunities

Technical Information Committee Meeting

A Technical Information Committee meeting will be held this spring to discuss the cap design and monitoring plan. U.S. EPA will announce the date, time, and location of the meeting in the local newspapers.

Responsiveness Summary

To obtain a copy of the complete Responsiveness Summary for the IEL site, please go to the Region 5 web site at:
www.epa.gov/region5/sites

Please see Page 5 for important information regarding EPA's web site.

or contact:

Denise (Gawlinski) Battaglia
Community Involvement Coordinator
U.S. EPA (P-19J)
77 West Jackson Blvd.
Chicago, IL 60604-3590
(312) 886-9859
battaglia.denise@epa.gov
or
Toll-Free at (800) 621-8431

INTRODUCTION

The U.S. Environmental Protection Agency (U.S. EPA) has signed an Amended Record of Decision (ROD) for the Industrial Excess Landfill (IEL) Superfund site in Uniontown, Ohio. The amended ROD revises the original cleanup plan, which was described in a ROD issued by U.S. EPA in July 1989.

U.S. EPA has revised the original cleanup plan as follows: (1) elimination of the groundwater pump-and-treat system; (2) restoration of contaminated groundwater through monitored natural attenuation; (3) installation of an alternative landfill cap with similar performance characteristics as the originally proposed cap; and (4) revision of the groundwater monitoring plan to include limited radiation testing. All other components of the 1989 ROD, such as expanding the methane gas venting system, maintaining a fence around the site perimeters, and restricting future land use remain the same.[1] This fact sheet describes the amended ROD and the rationale behind it. In addition, it summarizes some of the major public comments received on the proposed ROD amendment and U.S. EPA's responses to the comments.

U.S. EPA believes that the amended cleanup plan is protective of human health and the environment, complies with federal and state applicable or relevant and appropriate requirements and is cost-effective. The Ohio EPA has reviewed and provided comments on the amended ROD and has expressed no objections to the proposed remedy changes. For those members of the public who wish to review the amended ROD or the Responsiveness Summary in more detail, U.S. EPA encourages them to consult the documents found in the information repositories listed on the last page of this fact sheet. The Responsiveness Summary is a document that summarizes the public comments and concerns about the amendment to the original ROD, and it provides U.S. EPA's responses to all of the comments. In addition to the ROD and Responsiveness Summary, the information repositories contain all of the information upon which the decision to amend the ROD was based. The repositories also hold copies of the original ROD, Feasibility Study (FS), and Remedial Design (RD) for the IEL site. In addition to the repositories, all site-related documents are available for review at U.S. EPA's office in Chicago, Illinois (see last page of this fact sheet for the exact address).

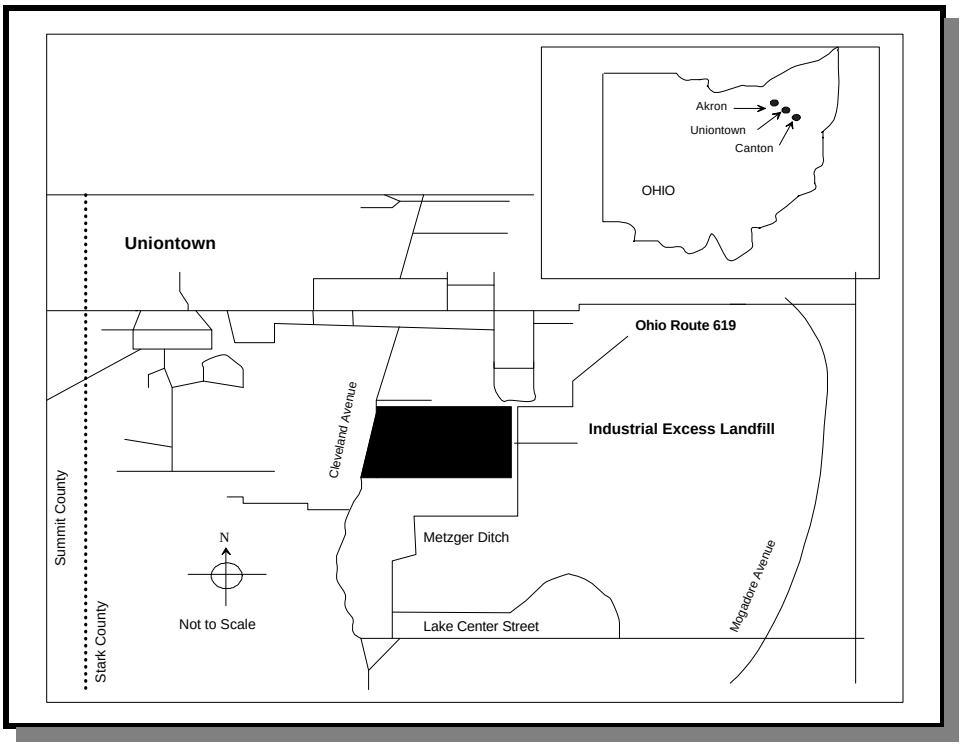
[1] In amending the 1989 ROD, U.S. EPA has followed the procedures set forth in Section 117 of the Comprehensive Environmental Response, Compensation, and Liability Act and in Section 300.435 (c)(2)(ii) of the National Oil and Hazardous Substances Pollution Contingency Plan.

SITE HISTORY

The IEL site is a closed landfill located on Cleveland Avenue in Uniontown, Ohio, about 10 miles southeast of Akron. From 1966 to 1980, the landfill accepted industrial, commercial, and residential wastes of largely undetermined and unknown composition.

Based on preliminary investigations conducted by U.S. EPA, the IEL site was proposed for the National Priorities List (NPL) in October 1984. The NPL is a list of sites that are eligible for study and cleanup under the Superfund Program.

In September 1985, U.S. EPA began a remedial investigation (RI) to determine the nature and extent of contamination at the site. At the conclusion of the investigation in 1988, U.S. EPA determined that:



Site Location Map

- The most extensive body of contaminated material was the waste and waste-soil mixture in the landfilled portions of the site;
- The groundwater beneath and west of the site was contaminated with organic and inorganic compounds; and
- Before a methane venting system was installed in 1985, methane gas and other organic vapors may have migrated off site.

.

Based on these results, U.S. EPA conducted a FS, which evaluated the methods available for cleaning up the site. This study was completed in July 1988.

In July 1989, U.S. EPA issued a ROD, which documented U.S. EPA's overall cleanup plan for the site. The major components of the ROD were: (1) installation of a multilayer Resource Conservation and Recovery Act (RCRA) Subtitle C-compliant cap over the entire surface of the landfill, (2) expansion of the existing methane gas venting system, and (3) extraction and treatment of contaminated groundwater beneath and near the landfill until cleanup levels are reached.

As U.S. EPA worked toward selection of a cleanup plan, it also took steps to protect public health before any final cleanup plan could be fully effective. The most important of these steps was the provision of municipal water to homes near the site where drinking water wells were affected or threatened by contamination from the site. By early 1991, nearly 100 homes in the vicinity of the IEL site had been connected to a new municipal water line.

Design of the overall cleanup plan began in 1990 and proceeded slowly, because of public concern about the possibility of radioactive waste being buried in the landfill. U.S. EPA responded to this concern by conducting four consecutive rounds of radiation testing of groundwater on a quarterly basis from May 1992 to March 1993. In September 1994, after a review of radiation data, a panel of experts drawn from U.S. EPA's Science Advisory Board (SAB) concluded that no significant evidence of radioactive contamination existed at IEL and that no further delay in implementing the IEL cleanup plan was warranted. Accordingly, U.S. EPA resumed work on the RD, which included additional groundwater sampling.

SITE HISTORY POST-1989 ROD

Since the 1989 ROD was signed, U.S. EPA received new information concerning the pattern of contamination at the site and landfill cap construction.

Pattern of Contamination. The original decision on the cleanup plan was made in 1989, based on data collected during the RI from 1985 to 1988. At that time, U.S. EPA was concerned that a plume of groundwater contamination, including volatile organic compounds (VOC) and metals, would move outward from the landfill, contaminating residential wells. Groundwater data collected during the RI revealed the presence of organic compounds attributed to IEL in residential wells immediately west of the site. As a result of this and other

findings of off-site groundwater contamination, U.S. EPA proposed a pump-and-treat system as a way of intercepting and neutralizing the contaminant plume. U.S. EPA also advocated pumping of groundwater to lower the water table, thereby preventing direct contact between groundwater and buried waste.

After issuing the ROD in 1989, U.S. EPA conducted seven rounds of groundwater sampling at IEL through 1993. Potentially responsible parties (PRPs) conducted two additional groundwater sampling rounds in March 1997 and September 1998 with approval and oversight from U.S. EPA. During the September 1998 round of testing, U.S. EPA also collected samples from some of the monitoring and residential wells.

Comparison of groundwater data collected in 1998 with data collected from 1990 through 1993 showed that organic compounds, such as benzene and vinyl chloride were no longer detected above federal maximum contaminant levels (MCL) for drinking water outside of landfill boundaries. Although certain metals were detected above the MCLs outside of the landfill in recent groundwater surveys, the total number detected were fewer; the concentrations were lower, on average; and exceedances were sporadic in nature. In addition, sampling of nearby residential wells in 1998 detected few metals, and those that were found were at concentrations well below MCLs. In January 1999, U.S. EPA proposed that a pump-and-treat system was no longer justifiable and that this component of the cleanup plan should be eliminated.

In addition, the results of the groundwater data analysis also suggested that groundwater quality at the IEL site may be improving through "natural attenuation." Natural attenuation is a process by which a variety of physical, chemical, or biological processes act without human intervention to reduce the mass, toxicity, mobility, volume, or concentration of contaminants in soil or groundwater. Evidence that natural attenuation is occurring at the IEL site includes the (1) reduction in both the number of contaminants detected and their respective concentrations over time and the (2) presence of breakdown products of known organic contaminants such as 1,1,1 trichloroethane; 1,2 dichloroethane; and 1,2 dichloroethene. U.S. EPA believes that the ability of this natural process to maintain groundwater quality outside of the boundaries of the landfill will be enhanced by installation of a new landfill cap that will prevent any further contamination release from the source area.

Landfill Cap Construction. The 1989 cleanup plan called for the construction of a conventional hazardous waste cap that would include both clay and synthetic liners. In January 1999, U.S. EPA proposed to modify the specifications of the cap design by eliminating the compacted clay liner. The proposed modified cap design included the use of (1) the existing soil cover, (2) a 12-inch engineered base/gas collection layer, (3) a geomembrane liner of very low-density polyethylene over the entire landfill area, (4) a drainage layer, and (5) 24 inches of top cover. Factors that contributed to U.S. EPA's new proposal for the modified cap were U.S. EPA's significant experience within the last 10 years in applying synthetic materials to the design of landfill covers and the absence of nearby borrow sources for clay. U.S. EPA estimated that the modified cap design would meet the same performance requirements described in the 1989 cleanup plan, reduce the possibility of truck-related accidents, and save about $3,900,000.

Overall, U.S. EPA estimated that eliminating the groundwater pump-and-treat system, using monitored natural attenuation, and modifying the landfill cap design would save about $12,000,000 over a 30-year span.

Responsiveness Summary

In January 1999, U.S. EPA released the proposed plan for the ROD amendment for public comment. The public was given 90 days to submit oral and written comments regarding the proposed plan to amend the ROD. U.S. EPA compiled, summarized, and responded to public comments in a document called a Responsiveness Summary, which is available for review at all three information repositories listed on the last page of this fact sheet. The full Responsiveness Summary will also be mailed to everyone who requested a copy at the March 2, 1999 public meeting. The Responsiveness Summary was made available to the public along with the amended ROD that was signed by U.S. EPA.

The Responsiveness Summary serves several functions. First, it provides U.S. EPA with information about the views of the community and PRPs regarding the proposed cleanup action; secondly, it documents the process used by U.S. EPA to review and respond to public comments on the proposed cleanup action. It also provides answers to all comments and questions received during the comment period. The following table represents a small example of the most frequent public comments and concerns that U.S. EPA received on its proposed amendment to the ROD, as well as U.S. EPA's responses.

The Responsiveness Summary is available on line at the Region 5 web site: www.wpa.gov/region5/sites
Please see Page 5 for important information regarding EPA's web site.

PUBLIC COMMENTS AND RESPONSES REGARDING THE AMENDED ROD FOR THE IEL SITE

Concern	Comment Summary	U.S. EPA Response
Full Characterization	Many concerned citizens have expressed the opinion that U.S. EPA has not characterized the site adequately to determine if natural attenuation is occurring or will occur.	U.S. EPA disagrees with the comment that the site has not been adequately characterized to determine whether natural attenuation is or will be occurring. Recent groundwater data indicates that a plume of contamination outside of the site boundary no longer exists. Therefore, a groundwater pump and treat system is not a necessary component of the remedy for the site. Also, because the remedy includes capping the landfill, full characterization of the material within the landfill is not necessary. However, U.S. EPA will monitor groundwater conditions on and off the site to ensure that natural attenuation is effective.
Radiation Testing and Risks	Many concerned citizens have challenged U.S. EPA's conclusions with regard to potential health risks posed by radioactive wastes at the site. These citizens requested that U.S. EPA notify the Nuclear Regulatory Commission of this potential problem, and some citizens requested that the groundwater be sampled for radiation again.	The September 1994 Science Advisory Board (SAB) report on U.S. EPA testing of the groundwater at the site (1990 to 1993) concluded that no evidence of radioactive contamination existed at the site. Based on four rounds of validated sampling results, U.S. EPA found that radiation levels in and around IEL were indicative of natural background conditions. Although the SAB report recommended some future radiation monitoring, this would be conducted after the cleanup remedy was implemented at the site. U.S. EPA will conduct radiation testing at the site in the future to ensure the protection of the health and welfare of the nearby community. The criteria for this testing will be spelled out in a long-term monitoring plan that will be developed in the near future.
Monitored Natural Attenuation Is the Appropriate Remedy For the IEL Site, Not a Landfill Cap	The potentially responsible parties (PRPs) maintain that the best remedy for the site would be to preserve the status quo, forgo any changes in the current landfill cover, continue groundwater monitoring, and impose institutional controls to restrict future land use.	U.S. EPA disagrees with the course of action for the IEL site outlined by the PRPs. Although U.S. EPA endorses natural attenuation of contaminated groundwater downgradient of the site boundary, it does not agree with the use of natural attenuation for the source area -- the landfill itself. About 1 million gallons of liquid wastes containing hazardous substances and 780,000 tons of solid waste, which may have contained hazardous substances, were disposed of in the landfill. Records describing the amount and type of waste disposed of at IEL are extremely limited. U.S. EPA is much less certain about contamination within the landfill than outside of it. With a containment remedy, this uncertainty does not present a problem, because the landfill cap system is designed to contain all contamination within the landfill, whatever it may be.
Tentatively Identified Compounds (TICs)	Some citizens expressed concern that the TICs found at the IEL site are harmful and contain radiation or radiation-related compounds. These citizens indicated that U.S. EPA has ignored information and concerns about TICs.	U.S. EPA has not found any evidence that TICs detected at IEL are harmful or contain radiation or radiation-related compounds. As a point of clarification, a TIC analysis does not detect radioactive parameters of any type. Radiation tests to detect the presence of such radioactive particles were done in separate surveys in 1990-1993. Contrary to community concerns that the Agency has ignored information and concerns about TICs, the actual work performed by U.S. EPA at IEL suggests just the opposite. With the exception of one sampling round, TIC analysis was conducted on all groundwater surveys by U.S. EPA. This is over and beyond what is typically done at Superfund sites. In any case, the data generated by U.S. EPA supports the conclusion it made regarding these groups of compounds -- a significant number of TICs could be explained by common laboratory contamination (e.g., toluene, methylene chloride, bis-2-ethylhexyl phthalate, etc.).
Status of Groundwater Quality Today Versus 10 Years Ago	No one has addressed the issue regarding where or what happened to the contamination evident in the early 1990s. A plume of contaminated groundwater may still exist off site.	Although many plausible causes may exist for the decreased presence of contaminants found around the landfill, U.S. EPA believes that evidence suggests contaminants are naturally attenuating. A comparison of the groundwater data taken between 1990 and 1993 and those taken between 1997 and 1998 indicated (1) contaminant concentrations are generally decreasing with time and (2) that the number contaminants detected have decreased over time. Although there have been sporadic incidences of metals concentrations in excess of drinking water standards, there is no concrete evidence that a plume of contamination still exists outside of the landfill boundaries.

To obtain a copy of the complete
Responsiveness Summary for the IEL site,
please go to the Region 5 web site at:
www.epa.gov/region5/sites.

EPA's web site was shut down on February 17 to review and improve security measures. Although the web site is back on line, several other systems that support the EPA web site are not yet ready to be reattached to the Internet server. One effect has been that EPA staff are not able to add new materials to the web site. These systems will be made available as soon as the necessary upgrades have been completed. Updated information on IEL, including the responsiveness summary, will be added to the web site as soon as possible.

You may also contact
Denise (Gawlinski) Battaglia
Community Involvement Coordinator
U.S. EPA (P-19J)
77 West Jackson Blvd.
Chicago, IL 60604-3590
(312) 886-9859
battaglia.denise@epa.gov
or
Toll-free at (800) 621-8431

Next Steps

☞ Technical Information Committee

A Technical Information Committee meeting will be held in Spring 2000 to discuss the draft cap design and the draft monitoring plan. The draft cap design and draft monitoring plan will be sent to the committee members for a 30-day review before the meeting is held.

☞ Community Involvement Plan

U.S. EPA is planning to revise the current community involvement plan for the IEL site. The community involvement plan will re-evaluate current techniques that U.S. EPA uses to inform and involve the community of the Superfund process at IEL. It will also serve to document any new community concerns since the comment period ended. In the Spring/Summer of 2000, U.S. EPA will be contacting community members and local officials who have previously expressed interest in the site. Please contact Denise Battaglia if you are interested in participating in this process.

FOR ADDITIONAL INFORMATION

If you have questions about the information in this fact sheet or would like additional information about the IEL Amended ROD, please write or call the contacts listed below.

U.S. EPA Contacts:

Denise (Gawlinski) Battaglia
Community Involvement Coordinator
U.S. EPA (P-19J)
77 West Jackson Blvd.
Chicago, IL 60604-3590
(312) 886-9859
battaglia.denise@epa.gov

Ross del Rosario
Remedial Project Manager
U.S. EPA (SR-6J)
77 West Jackson Blvd.
Chicago, IL 60604-3590
(312) 886-6195
delrosario.rosauro@epa.gov

State of Ohio Contact:

Larry Antonelli
Project Manager
Ohio Environmental Protection Agency
2110 East Aurora Road
Twinsburg, OH 44087
(330) 963-1127
larry.antonelli@epa.state.oh.us

or call U.S. EPA toll-free at (800) 621-8431

Copies of the Amended ROD, documents supporting the amended ROD, the Responsiveness Summary, and other site-related information are available for review in the information repositories at:

Lake Township Clerk's Office
12360 Market North
Hartville, Ohio

Hartville Branch Library
411 East Maple Street
Hartville, Ohio

These documents are also available for review in the U.S. EPA Records Center (7th Floor) in Chicago, Illinois.

U.S. Environmental Protection Agency
Region 5
Office of Public Affairs
77 West Jackson Boulevard (P-19J)
Chicago, IL 60604-3590

ADDRESS CORRECTION REQUESTED

FIRST CLASS

Printed on Recycled Paper